EXHIBIT 2

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UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION

DONALD AGEE, JR. et al.,

Plaintiffs,

v.

JOCELYN BENSON, et al.,

Defendants.

Case No. 1:22-CV-00272-RMK-JTN-PLM

DECLARATION OF KIMBALL BRACE

I, Kim Brace, declare and state pursuant to 28 U.S.C. § 1746 as follows:

1.   My name is Kimball William Brace. I am the president of Election Data Services,

Inc. ("EDS, Inc."), a Manassas, Virginia-based consulting firm whose specialty is

reapportionment, redistricting matters, election administration issues, and the census.

Michigan Redistricting Experience in 2021 to current

2.   In March 2021, Election Data Services, Inc. was selected through a competitive bid

process to provide full support and Map Drawing services to the Michigan Independent Citizens

Redistricting Commission (MICRC) during the redistricting process. These services included

building a full redistricting database, providing a full suite of redistricting software for the

Commissioners and staff to use to draw district configurations, providing map drawing staffers to

perform the actual district creation in the software at the direction of Commissioners in open and

fully transparent public meetings that were televised, along with creation of analytic software to

help the Commissioners understand the racial and political data utilized in the map drawing

process, along with the merger of Communities of Interest information that was created by another vendor.

3.   This work encompassed a multitude of different activities and tasks. Initially we were responsible for creating a massive database of 1) Census data (the results of the PL 94-171 program when it was released in August, 2021), 2) all Census geography (as provided by the Census Bureau's Topologically Integrated Geographic Encoding and Reference files (TIGER)), along with 3) political data (precinct level election results usually compiled by the Michigan Secretary of State back to 2012) and 4) political geography (the configuration of precincts to correspond to the election data, in many instances reflecting precinct changes that occurred during the decade). I have commonly termed these four elements of a redistricting database as the "redistricting data cube" when I make presentations to groups or the court. We also provided the redistricting software (in Michigan's instance it was the AutoBound Redistricting system for 2020 (called AutoBound EDGE)) and helped the state install it on every Commissioner's state-provided laptop. Support to the Commissioners for their individual needs was also provided.

4.   Our contract also provided that we have staff that would operate the redistricting software and draw district possibilities at the direction of Commission members. I, or my subcontracting staff of Kent Stigall and John Morgan, were at every meeting of the Commission to perform the tasks of actually drawing the districts using Commissioner's thoughts and directions in the AutoBound EDGE software.

5.   Even before the PL 94-171 Census data arrived in August 2021, we purchased commercially available population estimates from a demographic and GIS company called ESRI and incorporated them into the AutoBound EDGE system so that draft mapping could take place. At the same time, we incorporate the concepts of Community of Interests (COIs) and built linkages

to software and data files generated by MIT that allowed the public to recommend and draw their

own concept of Community of Interests for submission to the MICRC.

6.   We also incorporated a shapefile of the neighborhood boundaries of the City of

Detroit into the AutoBound EDGE system that could appear as an overlay and be turned on and

off as districts were drawn.

Current City of Detroit Neighborhood Overlay Maps

7.   The City of Detroit currently maintains a shapefile of the "[c]urrent (non-historic)

neighborhood boundaries as compiled by Department of Neighborhoods staff in concert with

community   groups."   *See*   Current   City   of   Detroit   Neighborhoods,

https://data.detroitmi.gov/datasets/detroitmi::current-city-of-detroit-

neighborhoods/explore?location=42.383246%2C-83.205018%2C11.97 (last visited Jun. 1, 2023).

8.   Based on the "Current City of Detroit Neighborhoods" shapefile that is currently

available on the City of Detroit's website, I supervised the preparation of Exhibit A to the Affidavit

of Anthony Eid (the "MICRC State House Hickory Plan - with City of Detroit Neighborhoods"),

a map showing the Detroit neighborhood boundaries overlaid on top of the enacted house plan,

Exhibit B to the Affidavit of Anthony Eid (the "Trende State House Plan - with City of Detroit

Neighborhoods"), a map showing the Detroit neighborhood boundaries overlaid on top of

Plaintiffs' expert Sean Trende's house demonstrative map, Exhibit C to the Affidavit of Anthony

Eid (the "Linden State Senate Plan - with City of Detroit Neighborhoods"), a map showing the

Detroit neighborhood boundaries overlaid on top of the enacted senate plan, Exhibit D to the

Affidavit of Anthony Eid (the "Trende State Senate #1 Plan - with City of Detroit

Neighborhoods"), a map showing the Detroit neighborhood boundaries overlaid on top of

Plaintiffs' expert Sean Trende's first senate demonstrative map, and Exhibit E to the Affidavit of

Anthony Eid (the "Trende State Senate #2 - with City of Detroit Neighborhoods"), a map showing

the Detroit neighborhood boundaries overlaid on top of Plaintiffs' expert Sean Trende's second

senate demonstrative map.

I declare under penalty of perjury that to the best of my memory the foregoing is true and correct.

Dated this 1st day of June, 2023.

By: _____
Kimball Brace

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